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**UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION**

In re: CATHODE RAY TUBE (CRT) ANTITRUST
LITIGATION

Case No. 07-cv-05944 (SC)

MDL No. 1917

This Document Relates To:

Sharp Electronics Corp., et al. v. Hitachi Ltd., et al.,
Case No. C 13-1173 (SC)

**SHARP'S ADMINISTRATIVE
MOTION TO FILE UNDER SEAL**
(CIVIL LOCAL RULE 79-5(d))

1 Pursuant to Federal Rule of Civil Procedure 5.2(e) and Civil Local Rules 7-11 and
 2 79-5(d), Plaintiffs Sharp Electronics Corporation and Sharp Electronics Manufacturing Company of
 3 America, Inc. (collectively, "Sharp") respectfully submit this Administrative Motion for a Sealing Order
 4 regarding Sharp's concurrently filed Opposition to Thomson S.A.'s Motion to Dismiss Sharp's First
 5 Amended Complaint.

6 Sharp's concurrently filed Opposition to Thomson S.A.'s Motion to Dismiss Sharp's
 7 First Amended Complaint, and certain exhibits referenced therein, discuss or contain information that
 8 has been designated by Toshiba Corporation, Panasonic Corporation, Panasonic Corporation of North
 9 America, Chunghwa Picture Tubes, Ltd., Hitachi Electronic Devices (USA), Inc., Samsung SDI Co.,
 10 Ltd., Samsung SDI (Malaysia) Sdn Bhd., Samsung SDI America, Inc., Samsung SDI Brasil Ltda.,
 11 Samsung SDI Mexico S.A. de C.V., Shenzhen Samsung SDI Co. Ltd, Tianjin Samsung SDI Co., Ltd.,
 12 Koninklijke Philips N.V., and Philips Electronics North America Corporation (the "Designating
 13 Parties") as "Confidential" or "Highly Confidential" under the terms of the Stipulated Protective Order
 14 entered in this case. Case No. 07-cv-05944 ECF 306, amended at ECF 1142. Specifically, Sharp's
 15 Opposition references or quotes directly from (1) portions of its First Amended Complaint in this matter
 16 (ECF 2030-4), and (2) exhibits designated by the Designating Parties as "Confidential" or "Highly
 17 Confidential" under the terms of the Protective Order. All documents and information sought to be
 18 sealed by the present Motion have previously been subject to administrative motions to file under seal in
 19 this case, and the Court has granted such motions.

20 On October 28, 2013, Sharp filed an administrative motion to file under seal portions of
 21 its First Amended Complaint that discussed, analyzed, or referenced information taken directly from
 22 material designated by a Defendant or Defendants in this matter as "Confidential" or "Highly
 23 Confidential," (ECF 2030), and in accordance with Local Rule 79-5(e)(1), the Designating Parties filed
 24 declarations establishing that all of the designated material was properly sealable (ECF 2034, 2036, and
 25 2191). Having considered the motion to file under seal and the declarations in support thereof, the Court
 26 found good cause to seal portions of Sharp's First Amended Complaint, and on November 12, 2013,
 27 ordered that the identified portions of ¶¶ 196-199, ¶¶ 239-240, and the identified portions of ¶ 259
 should be sealed. Order at ECF 2211. Portions of Sharp's concurrently filed Opposition to Motion to

1 Dismiss quote, reference, or discuss the sealed portions of the First Amended Complaint referenced
 2 above.

3 Similarly, on August 7, 2013, Sharp filed an administrative motion to file under seal
 4 portions of its Opposition to Thomson S.A.'s Motion to Dismiss for Lack of Personal Jurisdiction and
 5 Exhibits B through R, LL through SS, and UU attached thereto. A description of the documents
 6 designated "Confidential" or "Highly Confidential" is available at ECF 1835-1. In accordance with
 7 Local Rule 79-5(e)(1), the Designating Parties filed declarations establishing that all of the designated
 8 material was properly sealable (ECF 1843, 1844, 1847, and 1848), and this Court, finding good cause,
 9 ordered that the designated portions of Sharp's Opposition to Thompson S.A.'s Motion to Dismiss for
 10 Lack of Personal Jurisdiction, and the referenced exhibits thereto, were properly sealable and should be
 11 sealed. ECF 1852. Portions of Sharp's concurrently filed Opposition to Motion to Dismiss quote,
 12 reference, or discuss Exhibits B through R, LL through SS, or UU referenced above. .

13 Sharp is simply seeking to seal portions of its Opposition to Thomson, S.A.'s Motion to
 14 Dismiss the First Amended Complaint at pages 2:10-22, 5:10-24, 5:28, 6:6-11, 6:15-19, 6:21-24, 9:4-6,
 15 9:15-20, 9:23-28, 10:8-9, 12:23-24, 13:1-9, and 21:21-23 that discuss or contain information that has
 16 already been sealed by this Court. ECF 1852 & 2211. Therefore, Sharp requests that the Court grant the
 17 present Motion to Seal.

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 19 Dated: December 23, 2013 Respectfully submitted,
 20 By: /s/ Craig A. Benson

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